

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Petition for Rulemaking to)	
Implement Mandatory Minimum)	CG Docket No. 02-386
Customer Account Record Exchange)	
Obligations on All Local and)	
Interexchange Carriers)	
)	
Americatel Petition for Declaratory Ruling)	

To the Commission:

Reply Comments of:

THE OKLAHOMA RURAL TELEPHONE COMPANIES

**Atlas Telephone Company
Beggs Telephone Company
Canadian Valley Telephone Company
Cherokee Telephone Company
Chickasaw Telephone Company
Cimarron Telephone Company
Cross Telephone Company
Dobson Telephone Company
KanOkla Telephone Association, Inc.
McLoud Telephone Company
Pioneer Telephone Cooperative, Inc.
Pottawatomie Telephone Company
Salina-Spavinaw Telephone Company
Shidler Telephone Company
Valliant Telephone Company**

February 4, 2003

The above-referenced Incumbent Oklahoma Rural Telephone Companies (collectively "Oklahoma RTCs"), by and through their attorneys, respectfully submit these reply comments in response to Public Notice (DA-02-3550) released in this proceeding on December 20, 2002. The Oklahoma RTCs urge the Commission to deny

the Petition filed herein by AT&T Corp., Sprint Corporation, and WorldCom, Inc. (“Joint Petitioners”) requesting mandatory Customer Account Record Exchange (“CARE”) Information standards, and Americatele’s Petition for Declaratory Ruling requesting mandatory obligations of all LECS to provide timely and accurate Billing, Name and Address (BNA) information.

The Oklahoma RTCs disagree with the comments filed herein by Intrado Inc., stating that due to an absence of an effective exchange of customer information, the IXC’s are not able to adequately maintain their customer accounts, confirm customer orders or bill for long distance services rendered to their customers.¹ The Oklahoma RTCs further disagree with the comments of Intrado that the failings of the current practices can be remedied by imposing Billing Name and Address (BNA) requirements on all LECs. *Id.* Intrado appears to state that it is impossible to acquire the appropriate customer information they need to provide customer service and bill their end-users absent the FCC implementing mandatory CARE and BNA guidelines on the LECs. This is incorrect.

As more fully set forth in the Oklahoma RTCs Initial Comments, the exchange of CARE Information and BNA information is provided through contractual arrangements between LECs and the IXC’s. The Oklahoma RTCs currently provide CARE information to the IXC’s either pursuant to their Billing and Collection Agreements, or individual maintenance agreements. If the IXC has not entered into these agreements with the LECs, they have a direct business relationship with their long distance customers and are responsible for handling their own customer information.

¹ *Comments of Intrado, Inc. at Page 2*

The arguments of Intrado, as well as Americatel and the Joint Petitioners are perplexing because it is the IXC's responsibility, not the LECs, to maintain a relationship with their customers. If the IXCs cannot acquire their customer information directly from their customers, then the IXCs currently have the opportunity to enter into agreements not only with the LECs individually, but also with third party billing vendors, such as Illuminet and Independent NECA Services, to acquire the customer account and BNA information they need from LECs to provide customer service, and bill their customers for direct dialed and casual dialed calls.

Intrado further states that a national database should be implemented to address all billing issues associated with customer migration.² Intrado requests that CLECs and LECs be required to provide telephone number and effective date information into a central repository for the convenience of the IXCs. Intrado even states that this solution would minimize start-up costs for CLECs currently not providing CARE data, and also alleviate any need for the ILECs to alter their provisioning systems. This is wrong. This process would impose a time consuming, overly burdensome obligation on the Oklahoma RTCs, circumventing existing contractual arrangements, and provide no compensation. In short, Intrado, like Americatel and the Petitioner IXCs, are simply seeking to have other carriers perform their customer service work without paying proper compensation, and disguising this request as being essential to protect consumers.

Intrado's proposal, as well as those by Americatel and the Joint Petitioners will have anti-competitive results and may very well result in infringing on customer privacy, contrary to this Commission's Customer Proprietary Network Information Rules³.

² *Comments of Intrado, Inc. at Page 4*


³ *In the Matter of the implementation of the Telecommunications Act of 1996; and Telecommunications Carriers' Use of Customer Proprietary Network Information and Other*

For the reasons presented herein, and as more fully set forth in the Oklahoma RTCs' Comments filed on January 21, 2003, the Oklahoma RTCs' urge the Commission to deny the Petitioner IXCs' and Americatel's request for adoption of mandatory minimum CARE standards, and the provisioning of mandatory BNA service for all LECs and interexchange carriers. The self serving proposals result in the IXCs benefiting at the expense of the LECs; are anti-competitive; are contrary to this Commission's rules and policies to protect customer privacy; interfere with existing contractual arrangements contrary to the Act⁴; do not provide compensation to the LECs; and are unduly burdensome.

The Oklahoma RTCs appreciate the opportunity to provide comments, and participate to the fullest extent in this proceeding, including the presentation of *Ex Parte* comments to further elaborate on the issues discussed herein.

Respectfully submitted,

OKLAHOMA RURAL TELEPHONE COMPANIES

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Customer Information, CC Docket No 96-115, Third Report and Order and Third Further Notice of Proposed Rulemaking, Released July 25, 2002.

⁴ *In the Matter of Quest Communications International Inc., Petition for Declaratory Ruling on the Scope of the Duty to File and Obtain Prior Approval of Negotiated Contractual Arrangements under Section 252(a)(1)*. WC Docket No. 02-89; Released October 4, 2002; *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56 (1996) (1996 Act).